

RatingsDirect®

Aargauische Kantonalbank

Primary Credit Analyst:

Heiko Verhaag, Frankfurt (49) 69-33-999-215; heiko.verhaag@spglobal.com

Secondary Contact:

Bernd Ackermann, Frankfurt (49) 69-33-999-153; bernd.ackermann@spglobal.com

Table Of Contents

Major Rating Factors

Outlook

Rationale

Related Criteria And Research

Aargauische Kantonalbank

SACP	a+		+	Support	+3	+	Additional Factors	0
Anchor	a-			ALAC Support	0		Issuer Credit Rating AA+/Negative/A-1+	
Business Position	Adequate	0		GRE Support	+3			
Capital and Earnings	Very Strong	+2		Group Support	0			
Risk Position	Adequate	0		Sovereign Support	0			
Funding	Average	0						
Liquidity	Strong							

Major Rating Factors

Strengths:	Weaknesses:
<ul style="list-style-type: none"> • A sound financial profile, underpinned by very strong capitalization and sustained profitability. • High-quality loan book, dominated by granular and well-collateralized residential mortgages. • Ownership and statutory guarantee by and extremely high likelihood of support from the financially strong Canton of Aargau, if needed. 	<ul style="list-style-type: none"> • Concentration risks from limited geographic diversity and focus on residential mortgage lending. • Subdued growth prospects in the competitive home market. • Limited earnings diversification due to focus on real estate lending.

Outlook: Negative

S&P Global Ratings' negative outlook on Switzerland-based Aargauische Kantonalbank (AKB) solely reflects that on its majority owner and guarantor, the Canton of Aargau. A downgrade of Aargau would trigger a negative rating action on AKB. Under our government-related entity (GRE) criteria, with all other rating factors remaining unchanged, a one-notch downgrade of the canton would result in the removal of one of the three notches of uplift that we currently factor into the long-term rating on AKB.

Notwithstanding that, we expect that the bank's status as a GRE, and our view that there is an extremely high likelihood that the canton would provide support to AKB, if needed, will not change in the next few years. Moreover, we expect that AKB will maintain its sound financial profile, underpinned by its very strong capitalization and sound earnings capacity over the next 18-24 months.

We could also take a negative rating action if AKB's ties with the Canton of Aargau were to loosen or if changes to the canton's statutory guarantee were applied. This could lead us to review AKB's role for or link with the canton, which might lead to a weaker assessment of the bank's status as a GRE. However, we currently consider this scenario unlikely and expect AKB's existing obligations would be grandfathered.

If we considered that the downside scenario of the canton was becoming less likely, we would revise the outlook on Aargau to stable. All other rating factors remaining the same, we would then accordingly revise the outlook on AKB back to stable. A positive rating action based on AKB's stand-alone credit strength is remote at this stage because we do not expect the bank will revise its concentrated business model or will be able to materially improve its risk and funding position.

Rationale

Our ratings on AKB reflect its anchor of 'a-', its adequate business position, very strong capital and earnings, adequate risk position, average funding, and strong liquidity, as our criteria define these terms. We assess AKB's stand-alone credit profile (SACP) at 'a+'.

We consider AKB to be a GRE with an extremely high likelihood of receiving timely and sufficient extraordinary government support in times of financial distress. We base this on our view of AKB's very important role for and integral link with its home canton, the Canton of Aargau. We therefore apply a three-notch uplift to our assessment of AKB's SACP.

Anchor: 'a-' for domestic banks operating solely in Switzerland

We use our Banking Industry Country Risk Assessment (BICRA) economic risk and industry risk scores to determine a bank's anchor SACP, the starting point in assigning an issuer credit rating. Our anchor for a bank operating mainly in Switzerland is 'a-'. We view the trends for both economic and industry risk as stable. The anchor for AKB reflects its Swiss headquarters and its credit exposures, which are exclusively to Swiss-domiciled counterparties.

Our economic risk score of '2' for Switzerland is supported by the country's highly diversified and competitive economy, very high household income levels, and banks' prudent loan underwriting standards. However, it also reflects that risks have increased, owing to the cumulative rise in Swiss house prices and domestic lending over past several years. Although these imbalances are still low in a global context, they have led the regulator to enact

macro-prudential measures to rein in robust growth in mortgage indebtedness.

We recognize that house price and lending growth have cooled since the beginning of 2014. However, in our view, house prices and household indebtedness remain historically high, in particular when considering the low rate of home ownership in Switzerland. The very high mortgage debt level is mitigated by the large amount of financial assets, including pensions, held by households in Switzerland.

Our industry risk score of '2' primarily reflects the banking sector stability and a high share of deposit funding. Banks' net interest margins continue to decline gradually, given the pressure on deposit margins from the negative yield environment. This is partly offset, however, by higher margins on lending products, fee income from investment advisory-related activities, and cost management. As a result, banks are still able to generate returns on core banking products that are adequate to meet their cost of capital. Moreover, in our view, the Swiss regulator's regulatory initiatives are more stringent than those in other European banking industries.

Table 1

Aargauische Kantonalbank Key Figures					
--Year-ended Dec. 31--					
(Mil. CHF)	2016*	2015	2014	2013	2012
Adjusted assets	25,289.0	24,284.5	22,932.9	22,217.1	21,593.9
Customer loans (gross)	20,508.9	19,898.9	19,229.6	18,472.4	17,872.6
Adjusted common equity	2,083.3	1,998.1	1,888.2	1,794.1	1,707.4
Operating revenues	179.8	369.2	366.8	370.3	380.4
Noninterest expenses	93.5	185.2	185.3	190.1	199.1
Core earnings	85.4	181.5	161.7	161.8	157.7

*Data as of June 30. CHF--Swiss Franc.

Business position: Geographic and product concentration mitigated by stable business activity

We base our assessment of AKB's adequate business position on the bank's strong business stability, which offsets concentration risks arising from its focus on real estate lending in the Canton of Aargau. AKB's history of sound and sustainable profitability, prudent risk management, and cautious lending standards are fundamental in our business position assessment. Our assessment is further supported by customer loyalty instilled by the cantonal ownership and guarantee.

AKB is a midsize cantonal bank and ranks No. 6 out of a total of 24 cantonal banks in Switzerland (by total assets at year-end 2015) and operates in Northwest Switzerland, which is characterized by its strong small and midsize industrial sector.

Like most cantonal banks, AKB is expected to focus mainly on its home canton and its neighboring regions and is active primarily in residential mortgage lending (about 74% of the current loan book) and in financing local small and midsize enterprises. AKB's business activity also includes private-banking services to wealthy clientele in the canton.

Unlike many other cantonal banks we rate, AKB faces a more difficult competitive environment in its core market because several other domestic and regional banks compete in the canton as well. AKB consequently holds a lower market share than other cantonal banks of approximately 20%. Still, we expect AKB will maintain its market leading

position in Aargau over the next few years, building on its status as the cantonal bank.

The bank's geographic concentration in Aargau and neighboring regions exposes its business volumes and earnings to economic swings in a rather small economy, which is however located between the metropolitan areas of Basel and Zurich. Although we see risks arising from AKB's concentrated business position, we expect the bank will continue to post very sound and stable earnings in the coming years by keeping its focus on achieving appropriate risk-adjusted margins, rather than business volumes, with an exceptionally solid client base.

We do not expect any material shifts in the bank's business model under the new CEO, after the retirement of AKB's longstanding CEO in August 2016.

Table 2

Aargauische Kantonalbank Business Position					
	--Year-ended Dec. 31--				
(%)	2016*	2015	2014	2013	2012
Total revenues from business line (CHF mil.)	181.1	412.0	370.7	396.3	380.7
Commercial & retail banking/total revenues from business line	100.0	100.0	100.0	100.0	100.0
Return on equity	7.2	7.7	5.5	5.7	5.7

*Data as of June 30. N/A--Not applicable. CHF--Swiss franc.

Capital and earnings: Very strong compared with that of global peers

We continue to view AKB's capital position as very strong, based on our projected risk-adjusted capital (RAC) ratio. At year-end 2015, our RAC ratio for AKB had improved to 20.1% from 19.6% at year-end 2014, as earnings retention outweighed the growth in risk weighted assets. We expect this ratio to range between 19.75% and 20.25% over the next 18-24 months, based on continuing loan growth of around 4% per year and moderate dividend payouts.

The stability in capital ratios is further supported by the bank's capital target of a 16% common equity tier 1 (CET1) ratio, which has been agreed with the canton. This regulatory ratio, where the countercyclical capital buffer is deducted from capital, was 16.3% at year-end 2015. Although we understand that this agreement is not binding, we expect that the canton would adjust its dividend requirement to allow AKB's CET1 ratio to stay above the 16% target. It is noteworthy that AKB has not issued any hybrid securities, indicating the high quality of capital.

In our view, AKB's earnings are predictable and stable. We forecast profit before tax in the range of Swiss franc (CHF) 120 million-CHF130 million in 2016, and around CHF100 million over 2017 and 2018, owing to declining net interest margins and slightly increasing credit losses. Furthermore, we expect that the bank's dividend policy will remain in line with previous years--a payout ratio of 55%-65% of reported net income after allocation to general banking reserves.

Based on our projections, we expect AKB to maintain its comfortable earnings buffer in line with that of its Swiss peers. Such a buffer would act as a first line of defense beyond normalized losses in a potential adverse macroeconomic scenario.

Table 3

Aargauische Kantonalbank Capital And Earnings					
	--Year-ended Dec. 31--				
(%)	2016*	2015	2014	2013	2012
Tier 1 capital ratio	N/A	17.1	16.5	16.1	15.4
S&P RAC ratio before diversification	N.M.	20.1	19.6	21.4	19.7
S&P RAC ratio after diversification	N.M.	18.3	17.3	19.2	17.8
Adjusted common equity/total adjusted capital	100.0	100.0	100.0	100.0	100.0
Net interest income/operating revenues	69.0	68.6	69.1	71.7	71.0
Fee income/operating revenues	16.2	16.4	19.8	17.6	18.5
Market-sensitive income/operating revenues	13.7	13.5	9.7	8.1	9.1
Noninterest expenses/operating revenues	52.0	50.2	50.5	51.3	52.3
Preprovision operating income/average assets	0.7	0.8	0.8	0.8	0.9
Core earnings/average managed assets	0.7	0.8	0.7	0.7	0.8

*Data as of June 30. N/A--Not applicable. N.M.--Not meaningful.

Risk position: Concentration in residential mortgage lending, but strong risk metrics

We regard AKB's risk position as adequate. We think that the asset quality of AKB's loan portfolio is high, despite its inherent concentrations. We base our view on AKB's prudent risk management and lending standards, which we consider to be more stringent than those of competitors in the Swiss market.

We expect that loan book growth will slow slightly, because senior management is putting more emphasis on risk-adjusted-margins rather than volume growth. AKB's mortgage loan portfolio represents more than 93% of the loan book and consists mostly of residential real estate loans (75% of total loans). It is very granular, highly collateralized, and its average loan-to-value ratio was 63% at year-end 2015.

Due to AKB's focus on mortgage lending, we think that the housing price increases in Switzerland over the past several years will likely heighten the risks of correction and subsequently could hamper AKB's current sound asset quality. At the same time, we acknowledge that residential real estate price increases in Aargau have been lower than the Swiss average and have recently stabilized. However, the Aargau housing market may not be able to fully delink itself from the developments in the national housing market.

We generally view commercial lending as riskier than residential real estate loan business. Nevertheless, we believe the quality of AKB's commercial loan portfolio to be very sound because exposure to cyclical and riskier sectors, such as tourism or real estate development, is modest. The portfolio is largely collateralized by real estate and accounts for about 19% of AKB's loan book.

Positively, we believe that the bank will maintain its conservative underwriting standards in new mortgage lending, helping it to keep a marginal level of nonperforming loans in its loan book. This supports our estimate that credit losses will be less than 10 basis points on customer loans over the next two years.

AKB makes negligible use of complex products because it is dedicated to the local market and operates only with standard products. Market risk mainly comprises interest rate risk from mismatches in asset-liability management activities, which are adequately hedged, in our view. The current interest rate environment, characterized by negative

yields across many term buckets, poses many challenges for managing this risk type. It makes exposure hedging by way of interest rate swaps fairly expensive. Also, it is more difficult to make robust assumptions about client behavior and repricing related to deposit or loan products that do not have predetermined interest rate reset dates. This is an important feature for AKB's balance sheet since funding is largely through savings deposits, whereas the loan book consists mainly of longer-term fixed-rate loans. However, we note that the relative amount of money market mortgages is increasing, making it easier to hedge against rising interest rates. AKB engages in very limited trading activities, which are generally client initiated.

AKB, as many other Swiss banks, was subject to the tax investigations by U.S. authorities and applied for category 2 of the investigation program in 2013. In 2015, AKB was able to sign a non-prosecution agreement with the U.S. department of justice and to close the investigation. We do not expect any further repercussions for AKB's financial situation or reputation.

Table 4

Aargauische Kantonbank Risk Position					
		--Year-ended Dec. 31--			
(%)	2016*	2015	2014	2013	2012
Growth in customer loans	6.1	3.5	4.1	3.4	3.5
Total diversification adjustment / S&P RWA before diversification	N.M.	10.0	13.0	11.6	10.9
Total managed assets/adjusted common equity (x)	12.1	12.2	12.1	12.4	12.6
New loan loss provisions/average customer loans	(0.1)	(0.0)	0.1	0.1	0.1
Net charge-offs/average customer loans	N.M.	0.0	0.0	0.1	(0.1)
Gross nonperforming assets/customer loans + other real estate owned	N/A	1.4	1.8	2.1	2.4
Loan loss reserves/gross nonperforming assets	N/A	45.8	47.1	43.6	40.5

*Data as of June 30. N/A--Not applicable. N.M.--Not meaningful.

Table 5

Aargauische Kantonbank Risk-Adjusted Capital Framework Data					
(Mil. CHF)	Exposure*	Basel III RWA	Average Basel III RW (%)	Standard & Poor's RWA	Average Standard & Poor's RW (%)
Credit risk					
Government and central banks	2,719	5		82	3
Institutions	1,182	318		230	19
Corporate	6,057	4,268	70	4,399	73
Retail	14,282	6,136	43	4,117	29
Of which mortgage	12,637	4,763	38	3,032	24
Securitization§	0	0	0	0	0
Other assets	166	146	88	109	66
Total credit risk	24,407	10,873	45	8,937	37
Market risk					
Equity in the banking book†	26	36	138	192	728
Trading book market risk	--	73	--	110	--
Total market risk	--	110	--	302	--

Table 5

Aargauische Kantonalbank Risk-Adjusted Capital Framework Data (cont.)

Insurance risk					
Total insurance risk	--	--	--	0	--
Operational risk					
Total operational risk	--	686	--	701	--
(Mil. CHF)	Basel II RWA		Standard & Poor's RWA	% of Standard & Poor's RWA	
Diversification adjustments					
RWA before diversification	11,744		9,940	100	
Total diversification/concentration adjustments	--		994	10	
RWA after diversification	11,744		10,934	110	
(Mil. CHF)	Tier 1 capital	Tier 1 ratio (%)	Total adjusted capital	Standard & Poor's RAC ratio (%)	
Capital ratio					
Capital ratio before adjustments	2,000	17.0	1,998	20.1	
Capital ratio after adjustments†	2,000	17.0	1,998	18.3	

*Exposure at default. §Securitization exposure includes the securitization tranches deducted from capital in the regulatory framework. †Exposure and S&P Global Ratings' risk-weighted assets for equity in the banking book include minority equity holdings in financial institutions.

‡Adjustments to Tier 1 ratio are additional regulatory requirements (e.g. transitional floor or Pillar 2 add-ons). RWA--Risk-weighted assets. RW--Risk weight. RAC--Risk-adjusted capital. CHF--Swiss Franc. Sources: Company data as of Dec. 31, 2015, Standard & Poor's.

Funding and liquidity: Stable funding base, owing to a strong retail franchise

AKB's funding is average and in line with our BICRA score of '2' for systemwide funding in Switzerland. The bank's liquidity is strong, in our opinion. Both assessments reflect the stability we consider AKB enjoys, based on the guarantee provided by the canton.

The bank's core customer deposits account for 72% of its funding base and 80% of its loan portfolio. In addition, it has a comparably large equity position on its balance sheet of 8.2% of total assets. Due to the cantonal guarantee, we expect AKB's customer deposits will remain very stable, because we view AKB's customer base as very loyal. That said, we expect loans will continue to exceed deposits, with the ratio staying between 125% and 130%, which indicates AKB dependency on other means of funding.

These additional sources of AKB's funding mix are divided roughly equally between interbank funding and capital market funding, via secured and unsecured instruments. AKB's comparably large equity position on its balance sheet caters for the remainder of the long-term funding source. We expect AKB's stable funding ratio--S&P Global Ratings' measure of available long-term funding relative to long-term funding needs--will remain between 100% and 105% over the next few years, broadly comparable with metrics of other rated cantonal banks.

Our strong liquidity assessment reflects that AKB's broad liquid assets cover its short-term wholesale funding needs by 1.3x implying that it is able to operate for more than 12 months with no access to market funding. Although this ratio is slightly lower compared with some rated domestic-oriented Swiss banks we see as a mitigating factor, that short-term wholesale funding represents only about 11% of the total funding base.

We believe that owing to AKB's close ties with and the statutory guarantee by the canton of Aargau, the bank would not be exposed to large withdrawals of customer deposits in times of stress. During the most recent financial crisis, we actually observed a flight to quality that has strengthened AKB's funding profile.

Table 6

Aargauische Kantonbank Funding And Liquidity					
(%)	--Year-ended Dec. 31--				
	2016*	2015	2014	2013	2012
Core deposits/funding base	69.0	71.9	75.6	76.2	76.3
Customer loans (net)/customer deposits	129.0	125.6	123.3	121.1	120.9
Long term funding ratio	87.9	89.6	89.8	90.9	92.2
Stable funding ratio	102.0	102.9	99.4	101.7	103.3
Short-term wholesale funding/funding base	13.2	11.4	11.2	9.9	8.6
Broad liquid assets/short-term wholesale funding (x)	1.2	1.3	1.1	1.4	1.6
Net broad liquid assets/short-term customer deposits	4.4	5.6	2.4	5.4	7.8
Short-term wholesale funding/total wholesale funding	42.7	40.5	46.0	41.8	36.1
Narrow liquid assets/three-month wholesale funding (x)	1.9	1.9	1.6	1.7	2.0

*Data as of June 30.

External support: Extremely high likelihood of extraordinary support

We consider AKB to be a GRE, given its full ownership by the Canton of Aargau. The long-term rating on AKB is three notches higher than its SACP, reflecting our opinion of an extremely high likelihood of timely and sufficient extraordinary government support for AKB from its owner in the event of financial distress.

We view AKB as having an integral link with and a very important role for Aargau, which is primarily facilitated by the cantonal guarantee in place. We also think a potential default of AKB would have a significant systemic impact for the local economy, which further incentivizes support mechanisms for the bank in case it encounters financial distress.

Additional rating factors: None

No additional factors affect our rating on AKB.

Related Criteria And Research

Related Criteria

- Rating Government-Related Entities: Methodology And Assumptions, March 25, 2015
- Group Rating Methodology, Nov. 19, 2013
- Quantitative Metrics For Rating Banks Globally: Methodology And Assumptions, July 17, 2013
- Banks: Revised Market Risk Charges For Banks In Our Risk-Adjusted Capital Framework, June 22, 2012
- Banks: Rating Methodology And Assumptions, Nov. 9, 2011
- Banking Industry Country Risk Assessment Methodology And Assumptions, Nov. 9, 2011
- Bank Capital Methodology And Assumptions, Dec. 6, 2010
- Use Of CreditWatch And Outlooks, Sept. 14, 2009
- Commercial Paper I: Banks, March 23, 2004

Related Research

- Banking Industry Country Risk Assessment: Switzerland, Sept. 2, 2016
- Aargauische Kantonalbank Outlook Revised To Negative After Similar Action On Its Cantonal Owner; 'AA+/A-1+' Affirmed, July 26, 2016
- Swiss Canton Of Aargau Outlook Revised To Negative; Ratings Affirmed At 'AAA/A-1+', July 22, 2016

Anchor Matrix										
Industry Risk	Economic Risk									
	1	2	3	4	5	6	7	8	9	10
1	a	a	a-	bbb+	bbb+	bbb	-	-	-	-
2	a	a-	a-	bbb+	bbb	bbb	bbb-	-	-	-
3	a-	a-	bbb+	bbb+	bbb	bbb-	bbb-	bb+	-	-
4	bbb+	bbb+	bbb+	bbb	bbb	bbb-	bb+	bb	bb	-
5	bbb+	bbb	bbb	bbb	bbb-	bbb-	bb+	bb	bb-	b+
6	bbb	bbb	bbb-	bbb-	bbb-	bb+	bb	bb	bb-	b+
7	-	bbb-	bbb-	bb+	bb+	bb	bb	bb-	b+	b+
8	-	-	bb+	bb	bb	bb	bb-	bb-	b+	b
9	-	-	-	bb	bb-	bb-	b+	b+	b+	b
10	-	-	-	-	b+	b+	b+	b	b	b-

Ratings Detail (As Of September 29, 2016)

Aargauische Kantonalbank

Counterparty Credit Rating

AA+/Negative/A-1+

Counterparty Credit Ratings History

26-Jul-2016

AA+/Negative/A-1+

01-Dec-2014

AA+/Stable/A-1+

03-Jul-2012

AAA/Negative/A-1+

Sovereign Rating

Swiss Confederation

AAA/Stable/A-1+

Related Entities

Aargau (Canton of)

Issuer Credit Rating

AAA/Negative/A-1+

Senior Unsecured

AAA

*Unless otherwise noted, all ratings in this report are global scale ratings. S&P Global Ratings' credit ratings on the global scale are comparable across countries. S&P Global Ratings' credit ratings on a national scale are relative to obligors or obligations within that specific country. Issue and debt ratings could include debt guaranteed by another entity, and rated debt that an entity guarantees.

Additional Contact:

Financial Institutions Ratings Europe; FIG_Europe@spglobal.com

Copyright © 2016 by S&P Global Market Intelligence, a division of S&P Global Inc. All rights reserved.

No content (including ratings, credit-related analyses and data, valuations, model, software or other application or output therefrom) or any part thereof (Content) may be modified, reverse engineered, reproduced or distributed in any form by any means, or stored in a database or retrieval system, without the prior written permission of Standard & Poor's Financial Services LLC or its affiliates (collectively, S&P). The Content shall not be used for any unlawful or unauthorized purposes. S&P and any third-party providers, as well as their directors, officers, shareholders, employees or agents (collectively S&P Parties) do not guarantee the accuracy, completeness, timeliness or availability of the Content. S&P Parties are not responsible for any errors or omissions (negligent or otherwise), regardless of the cause, for the results obtained from the use of the Content, or for the security or maintenance of any data input by the user. The Content is provided on an "as is" basis. S&P PARTIES DISCLAIM ANY AND ALL EXPRESS OR IMPLIED WARRANTIES, INCLUDING, BUT NOT LIMITED TO, ANY WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR USE, FREEDOM FROM BUGS, SOFTWARE ERRORS OR DEFECTS, THAT THE CONTENT'S FUNCTIONING WILL BE UNINTERRUPTED, OR THAT THE CONTENT WILL OPERATE WITH ANY SOFTWARE OR HARDWARE CONFIGURATION. In no event shall S&P Parties be liable to any party for any direct, indirect, incidental, exemplary, compensatory, punitive, special or consequential damages, costs, expenses, legal fees, or losses (including, without limitation, lost income or lost profits and opportunity costs or losses caused by negligence) in connection with any use of the Content even if advised of the possibility of such damages.

Credit-related and other analyses, including ratings, and statements in the Content are statements of opinion as of the date they are expressed and not statements of fact. S&P's opinions, analyses, and rating acknowledgment decisions (described below) are not recommendations to purchase, hold, or sell any securities or to make any investment decisions, and do not address the suitability of any security. S&P assumes no obligation to update the Content following publication in any form or format. The Content should not be relied on and is not a substitute for the skill, judgment and experience of the user, its management, employees, advisors and/or clients when making investment and other business decisions. S&P does not act as a fiduciary or an investment advisor except where registered as such. While S&P has obtained information from sources it believes to be reliable, S&P does not perform an audit and undertakes no duty of due diligence or independent verification of any information it receives.

To the extent that regulatory authorities allow a rating agency to acknowledge in one jurisdiction a rating issued in another jurisdiction for certain regulatory purposes, S&P reserves the right to assign, withdraw, or suspend such acknowledgement at any time and in its sole discretion. S&P Parties disclaim any duty whatsoever arising out of the assignment, withdrawal, or suspension of an acknowledgment as well as any liability for any damage alleged to have been suffered on account thereof.

S&P keeps certain activities of its business units separate from each other in order to preserve the independence and objectivity of their respective activities. As a result, certain business units of S&P may have information that is not available to other S&P business units. S&P has established policies and procedures to maintain the confidentiality of certain nonpublic information received in connection with each analytical process.

S&P may receive compensation for its ratings and certain analyses, normally from issuers or underwriters of securities or from obligors. S&P reserves the right to disseminate its opinions and analyses. S&P's public ratings and analyses are made available on its Web sites, www.standardandpoors.com (free of charge), and www.ratingsdirect.com and www.globalcreditportal.com (subscription) and www.spcapitaliq.com (subscription) and may be distributed through other means, including via S&P publications and third-party redistributors. Additional information about our ratings fees is available at www.standardandpoors.com/usratingsfees.

STANDARD & POOR'S, S&P and RATINGSDIRECT are registered trademarks of Standard & Poor's Financial Services LLC.